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Via Electronic Filing

February 18, 2010

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

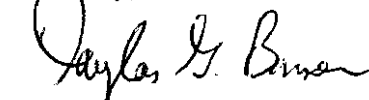
Re: Petition of Standing Rock Telecommunications, Inc. To Redefine Rural Service Areas, WC Docket No 09-197.

Dear Ms. Dortch:

Pursuant to 47 U.S.C. § 214(e)(6) and 47 C.F.R. § 54.207, please find enclosed for filing the Petition of Standing Rock Telecommunications, Inc. ("SRTI") To Redefine Rural Service Areas.

Please let me know if you have any questions.

Sincerely,



Douglas G. Bonner  
Counsel for Standing Rock Telecommunications,  
Inc.

Enclosure

No. of Copies rec'd 0  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	WC Docket No. 09-197
	)	
Petition of Standing Rock	)	
Telecommunications, Inc.,	)	
to Redefine Rural Service Areas	)	
	)	

PETITION OF  
STANDING ROCK TELECOMMUNICATIONS, INC.  
TO REDEFINE RURAL SERVICE AREAS

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## EXECUTIVE SUMMARY

Standing Rock Telecommunications, Inc. (“SRTI”), a 100% Tribal-government owned wireless carrier of the Standing Rock Sioux Tribe (“SRST”), respectfully petitions the Commission pursuant to 47 U.S.C. § 214(c)(6) to redefine SRTI’s rural study area as mirroring SRTI’s licensed service area, the Standing Rock Sioux Reservation (“Reservation”). This petition supplements a pending Petition for designation as an Eligible Telecommunications Carrier filed by SRTI on December 18, 2009 in WC Docket No. 09-197, by providing additional information to assist the Commission in redefining the current study areas to reflect SRTI’s licensed service area.

There is ample precedent for the Commission to both designate the ETC status of a Tribal government owned wireless ETC applicant, and to redefine the rural study areas for a Tribal-government owned carrier and for a common carrier not subject to state commission jurisdiction under Section 214(c)(6).

This redefinition will include portions of the study areas of three rural - and one non-rural - incumbent local exchange carriers (“ILECs”). The redefinition will have no impact on current ILECs’ universal service support, as funding will continue to be available to the ILECs for all of the eligible lines they serve. Additionally, as SRTI’s Petition makes clear, it is not adversely “cream-skimming,” or trying to carve out the most profitable areas to serve, as SRTI will serve all areas within its approved service area.

Redefining SRTI’s rural study area will foster the Commission’s goals of encouraging competition in the telecommunications marketplace, providing wireless services to isolated residents who may not otherwise have access to these services, and extending universal service to additional rural North Dakota and South Dakota consumers in need.

Significantly, redefining these study areas is consistent with the Constitutional relationship and the Treaty agreements between the federal government and the SRST, and the established principles of federal Indian law and the federal trust responsibility, to empower the Tribe to provide services on its own lands.

**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, D.C. 20554**

<b>In the Matter of</b>	)	<b>WC Docket No. 09-197</b>
	)	
<b>Petition of Standing Rock</b>	)	
<b>Telecommunications, Inc.,</b>	)	
<b>to Redefine Rural Service Areas</b>	)	
	)	

**PETITION OF  
STANDING ROCK TELECOMMUNICATIONS, INC.  
TO REDEFINE RURAL SERVICE AREAS**

**I. INTRODUCTION**

Standing Rock Telecommunications, Inc. ("SRTI"), a 100% Tribal-government owned wireless carrier of the Standing Rock Sioux Tribe ("SRST"), respectfully petitions the Commission to Redefine Rural Service Areas pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended,<sup>1</sup> consistent with SRTI's licensed service area within the external boundaries of the Standing Rock Sioux Reservation ("Reservation"). This petition supplements a pending Petition for designation as an Eligible Telecommunications Carrier ("ETC") filed by SRTI on December 18, 2009,<sup>2</sup> by providing additional information to assist the Commission in redefining the current study areas to reflect SRTI's licensed service area.

SRTI understands that is the first 100% Tribal-government owned wireless carrier, and the first such carrier to petition the Commission for ETC designation and concurrent study area redefinition.

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<sup>1</sup> See 47 U.S.C. § 214(e) ("Provision of Universal Service"); as amended (Pub. L. No. 105-125, 1997).

<sup>2</sup> Petition of Standing Rock Telecommunications, Inc. Designation As an Eligible Telecommunications Carrier, WC Docket No. 09-197 (Public Notice Release Date: Jan. 19, 2010) ("Application").

However, there is ample precedent for the Commission to designate ETC status and to redefine rural study areas for Tribal-government owned carriers, or for a wireless carrier not subject to state jurisdiction.<sup>3</sup>

SRTI, therefore, respectfully petitions the Commission to redefine SRTI's rural study area as mirroring SRTI's licensed service area, the Reservation. This redefinition will include portions of the study areas of three rural ILEC's: the Cheyenne River Sioux Tribe Telephone Authority ("CRSTTA"); West River Cooperative Telephone Company ("WRTC"); and West River Telecommunications Cooperative ("WRT"), and one non-rural ILEC Qwest Corporation ("Qwest"), hereinafter referred to collectively as "Incumbent ILECs" pursuant to the process set forth in Section 54.207(c) of the Commission's rules.

Redefining or reclassifying these study areas down to the wire center level will allow for more than one ETC to operate in an area with limited or no wireless service. The redefinition will have no impact on current ILECs' universal service support, as the funding will continue to be available to the ILECs for all of the eligible lines they serve. Additionally, SRTI is not adversely "cream-skimming," or trying to carve out the most profitable areas to serve, as SRTI will serve all areas within its approved service area.

Redefining the study areas will also foster the Commission's goals of encouraging competition in the telecommunications marketplace, providing wireless services to isolated residents who may not otherwise have these services, and extending universal service to additional rural North

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<sup>3</sup> *In the Matter of Federal-State Joint Board on Universal Service; Virginia Cellular I.L.C. Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, ("Virginia Cellular"), 19 FCC Rcd. 1563, 1582 (2003) ("Because Virginia Cellular is limited to providing facilities-based service only where it is licensed by the Commission and because Virginia Cellular commits to providing universal service throughout its licensed territory... concerns regarding cream-skimming are minimized." (footnote omitted)); *In the Matter of Federal-State Joint Board on Universal Service; Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier for the Pine Ridge Reservation in South Dakota*, ("Western Wireless"), 16 FCC Rcd. 18133, 18140 ("[T]he Commission, in the absence of state jurisdiction over a carrier, has a statutory obligation to be the sole designating entity under section 214(e)(6).". Accordingly, the Commission, rather than the state commission, designated the geographic service area of the wireless ETC as the boundaries of the Pine Ridge Reservation, despite the fact that the designated service area differs from the study areas of three rural telephone companies since, in part, the incumbent study areas extend "beyond the boundaries of the Reservation....")

Dakota and South Dakota consumers in need. Perhaps most importantly, however, redefining these study areas is consistent with the Constitutional relationship and the Treaty agreements with the SRST, and the established principles of federal Indian law and the federal trust responsibility, to empower the Tribe to provide services on its own lands.

## II. BACKGROUND

SRTI has filed this petition in conjunction with its Petition to the Commission for Designation as an Eligible Telecommunications Carrier for purposes of receiving high-cost and low income support from the federal universal service fund.<sup>4</sup> SRTI is owned and chartered by the government of the SRST and is licensed by the Commission to provide wireless personal communications service within the exterior boundaries of the SRST Reservation (which coincide with the boundaries of Sioux County, North Dakota; and Corson County, South Dakota) (in the partitioned area of the Minneapolis-St. Paul Metropolitan Trading Area (MTA), MTA012). In this petition we provide additional information to the Commission to redefine the current study areas down to the wire center level in order to reflect the approved service area of SRTI which overlaps with the current service areas of four incumbent LECs.

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<sup>4</sup> The *Twelfth Report and Order* concluded that a carrier seeking designation of eligibility to receive federal universal service support for telecommunications service offered on tribal lands may petition the Commission for designation under section 214(e)(6) without first seeking designation from the state commission. *Twelfth Report and Order*, 15 FCC Rcd 12208, 12265-69, ¶¶ 115-27 (2000). *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas, Twelfth Report and Order, memorandum Opinion and Order, and Further Notice of Proposed Rulemaking*, 15 FCC Rcd 12208 (2000) (“*Twelfth Report and Order*”). In the *Twelfth Report and Order* the Commission also noted that the legislative history of section 214(e)(6) makes clear that the class of carriers covered by this provision is “dominated by tribally owned carriers,” although not limited to this. *Id.* at 12261, ¶ 106.

**(1) The Communications Act Establishes a Process for Redefinition of Study Areas.**

The Communications Act of 1934, as amended (the “Act”) sets forth a process whereby a competitive ETC may be designated for a service area that differs from that of the ILEC.<sup>5</sup> The Commission and the Federal-State Joint Board on Universal Service (“Joint Board”) have recognized that a strict rule requiring a competitive ETC to serve an area exactly matching a rural ILEC’s study area would preclude competitive carriers that fully satisfy ETC requirements from bringing the benefits of competition to consumers throughout their service territory.<sup>6</sup> This principle is particularly true for carriers servicing tribal areas, such as a Tribal-government owned carrier serving customers within reservation boundaries that differ from ILEC RSAs. Therefore, the Commission has established a streamlined procedure to redefine rural ILEC service areas.<sup>7</sup> Using this procedure, the Commission has applied the Joint Board’s recommendations and concluded that it is necessary and appropriate to redefine the rural ILEC service areas to permit the designation of competitive ETCs in overlapping areas.<sup>8</sup>

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<sup>5</sup> “Service area” means such company’s “study area” unless and until the Commission and the States, after taking into account recommendations of a Federal-State Joint Board instituted under section 410(c) of this title, establish a different definition of service area for such company. 47 U.S.C. § 214(c).

<sup>6</sup> See *Petition for Agreement with Designation of Rural Company Eligible Telecommunications Carrier Service Areas and for Approval of the Use of Disaggregation of Study Areas for the Purpose of Distributing Portable Federal Universal Service Support*, Memorandum Opinion and Order, 15 FCC Rcd 9924, 9927 n.40 (1999) (“Washington Redefinition Order”), citing *Federal-State Joint Board on Universal Service, Recommended Decision*, 12 FCC Rcd 87, 181 (1996) (“Joint Board Recommended Decision”).

<sup>7</sup> See 47 C.F.R. § 54.207(c). See also *Federal-State Joint Board on Universal Service, Report and Order*, 12 FCC Rcd 8776, 8881 (1997) (“First Report and Order”).

<sup>8</sup> See, e.g., *Public Notice, Smith Bagley, Inc. Petitions for Agreement to Redefine the Service Areas of Navajo Communications Company, Citizens Communications Company of the White Mountains, and CenturyTel of the Southwest, Inc. On Tribal Lands Within the State of Arizona*, DA 01-409 (rel. Feb. 15, 2002) (effective date May 16, 2002); *Washington Redefinition Order*, *supra*, 15 FCC Rcd at 9927-28.



## **(2) The Commission Has the Authority to Redefine the Study Area for SRTI.**

In the *Twelfth Report and Order*, the Commission established a framework for the ETC designation process under Section 214(e)(6) for carriers serving Tribal lands.<sup>9</sup> The Commission specifically concluded that a carrier seeking ETC designation on Tribal lands may petition the Commission directly without first seeking designation from the state commission.<sup>10</sup> Section 214(e)(5)'s definition of the "service area" or "study area" further references the Commission's own authority to redefine study areas for applicants who, like SRTI, are not subject to state jurisdiction.<sup>11</sup> The Commission has specifically addressed its own authority over study area issues with regard to applicants seeking to serve Tribal lands in *Western Wireless*:

We reject the contention of a few parties that the Commission must consult with the [state] Commission before designating Western Wireless as an ETC for a service area that differs from the rural telephone company's study area. We conclude that the federal-state process in section 214(e)(5) contemplates situations in which only one entity, either the state commission or this Commission, has the authority to designate the rural telephone company's entire study area as the ETC's service area. ...In any event, we do not believe that Congress envisioned that the designating entity might need to involve another regulatory body, or seek its permission, before designating an ETC for a service area otherwise lying wholly within its jurisdiction....<sup>12</sup>

## **(3) Study Areas Identified for Re-definition by Wire Center Designation.**

SRTI has filed for federal ETC status on December 18<sup>th</sup> 2009, and has requested that its ETC service area be defined to be coterminous with its Commission-licensed service area, the Reservation.<sup>13</sup> SRTI's Commission-licensed service area does not correspond with the current

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<sup>9</sup> "[A] common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State Commission" may apply directly to the Commission for ETC status. *Twelfth Report and Order*, 15 FCC Rcd at 12265 (2000).

<sup>10</sup> *Id.* ¶ 115.

<sup>11</sup> Section 214 (e)(5) "[t]he term "service area" means a geographic area established by a State commission (or the Commission under paragraph (6))".

<sup>12</sup> *Western Wireless*, 16 FCC Rcd. at 18140.

<sup>13</sup> See Application at Exhibit VIII – Service Area

boundaries of the Incumbent LECs' service areas. The Act and Commission rules provide, therefore, that the affected Incumbent LECs' rural service areas must be redefined before LEC designation in certain areas can take effect. Redefinition is therefore requested for each of the wire centers which happen to be located both within the SRTI service area and within the current ILEC study areas.<sup>14</sup> SRTI requests that the Commission redefine the wire centers in each of the following service areas:

- a. For Cheyenne River Sioux Tribe Telephone Authority (CRSTTA), the service area should be redefined by creating a service area comprised of;
  - i. Isabel wire center in South Dakota;
- b. For West River Cooperative Telephone Company (WRCTC), the service area should be redefined by creating a service area comprised of;
  - i. Lemmon wire center in North Dakota and South Dakota;
  - ii. Meadow wire center in South Dakota;
- c. For West River Telecommunications Cooperative (WRTC), the service area should be redefined by creating a service area comprised of;
  - i. St. Anthony wire center in North Dakota,
  - ii. Selfridge wire center in North Dakota,
  - iii. Fort Yates wire center in North Dakota,
  - iv. McLaughlin wire center in South Dakota.
  - v. Mobridge wire center in South Dakota.
- d. For Qwest Corporation (Qwest), the service area should be redefined by creating a service area comprised of;
  - i. McIntosh wire center in North Dakota and South Dakota,
  - ii. Morristown wire center in North Dakota and South Dakota,
  - iii. Timberlake wire center in South Dakota.

### **III. DISCUSSION**

SRTI's Petition to redefine rural ILEC service areas is consistent with federal Universal Service policy and satisfies the three Joint Board factors under Section 54.207(c)(1) of the Commission's Rules, as well as the competitively neutral universal service policies embedded in the Act. Specifically, redefining the Incumbent LEC service areas to correspond with SRTI's licensed

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<sup>14</sup> Section 54.207(c).

service area, to promote competitive options for rural consumers and to provide wireless services to isolated consumers that may not otherwise have wireless telecommunications services.

**(1) SRTI's Requested Redefinitions are Consistent with Federal Universal Service Policy and Prior Commission Decisions.**

Congress, in enacting the 1996 amendments to the Act, declared its intent to “promote competition and reduce regulation” and to “encourage the rapid deployment of new telecommunications technologies.”<sup>15</sup> As part of its effort to further these goals, Congress enacted new universal service provisions that, for the first time, envisioned multiple ETJs in the same market.<sup>16</sup> In furtherance of this statutory mandate, the Commission adopted the principle that universal service mechanisms be administered in a competitively neutral manner, meaning that no particular type of carrier or technology should be unfairly advantaged or disadvantaged.<sup>17</sup>

The use of high-cost support for infrastructure investment will ensure that the rural customers of the SRTI service area have access to affordable, reliable, high-quality, advance, safe and ubiquitous wireless telecommunication services.<sup>18</sup> Redefinition will also remove a critical obstacle to competition, consistent with federal telecommunications policy.<sup>19</sup>

SRTI's proposed redefinitions are consistent with the Commission's policy and prior decisions. Redefinition in the manner proposed will allow SRTI to provide services throughout its licensed service area within the SRTI tribal boundaries.

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<sup>15</sup> Pub. L. No. 104-104, 110 Stat. 56 (1996) (preamble).

<sup>16</sup> See 47 U.S.C. § 214(e)(2).

<sup>17</sup> See *First Report and Order*, *supra*, 12 FCC Rcd at 8801. Competitive neutrality is a “fundamental principle” of the FCC's universal service policies. *Guam Cellular and Paging, Inc., Petition for Waiver of Section 54.314 of the Commission's Rules and Regulations*, CC Docket No. 96-45, DA 03-1169 at ¶ 7 (Tel. Acc. Pol. Div. rel. Apr. 17, 2003).

<sup>18</sup> 47 U.S.C. § 254.

<sup>19</sup> See Joint Explanatory Statement of the Committee of Conference, H.R. Conf. Rep. No. 458, 104th Cong., 2d Sess. At 113 (stating that the 1996 Act was designed to create “a pro-competitive, de-regulatory national policy framework” aimed at fostering rapid deployment of telecommunications services to all Americans “by opening all telecommunications markets to competition. . .”).

**(2) SRTI's Requested Redefinitions Satisfy All Three Joint Boards' Factors Under Section 54.207(c)(1) Of The Commission's Rules.**

As recognized by the Commission, the Joint Board expressed the following concerns regarding the redefinition of rural telephone company services areas: "(1) minimizing cream-skimming; (2) recognizing that the 1996 Act places rural telephone companies on a different competitive footing from other LECs; and (3) recognizing the administrative burden of requiring rural telephone companies to calculate costs at something other than a study area level."<sup>20</sup> SRTI addresses all three concerns below.

a. There is no cream-skimming.

First, the Joint Board expressed concern as to whether the competitive carrier is attempting to "cream-skin" by only proposing to serve the lowest cost exchanges.<sup>21</sup> SRTI's application does not reflect any cream-skimming. As a wireless carrier, SRTI will provide service to all areas where it is currently has spectrum and is licensed by the Commission, or to all areas within the boundaries of the Reservation. SRTI is not picking and choosing the lowest-cost exchanges; on the contrary, SRTI proposes an ETC service area that is coterminous with its licensed service territory, and is committed to offer service to customers throughout its designated ETC service area.

The term "cream-skimming" implies that a would-be ETC would intentionally choose to serve low-cost areas and obtain ETC support while avoiding sparsely populated, high-cost areas. The reality is that there is no "cream" to skim within the SRTI service area, because virtually the entire service area is sparsely populated. The population density within the Reservation is 3.7 persons and 1.7 persons per square mile in Sioux County, ND and Corson County, SD, respectively. Therefore, the service area that SRTI proposes to serve has a weighted average of 2.7 persons per square mile. By any standard, SRTI serves one of the most sparsely populated regions

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<sup>20</sup> *Virginia Cellular*, 19 FCC Rcd at 1582.

<sup>21</sup> *See Joint Board Recommended Decision*, 12 FCC Rcd at 180.

of its size in the United States. Consistent with the Commission's recognition that "a low population density typically indicates a high-cost area,"<sup>22</sup> SRTI's Application provides population density figures to demonstrate that no cream-skimming will result from ETC designation in the proposed areas.

SRTI's Application makes clear that it meets the Commission's criteria in its analysis of population density as a means of determining the likelihood of SRTI receiving uneconomic levels of support.<sup>23</sup> Opportunities for receiving uneconomic levels of support are further diminished by the Commission's decision to allow rural LECs to disaggregate support below the study-area level.<sup>24</sup> By moving support away from low-cost areas and into high-cost areas, ILECs have had the ability to minimize or eliminate cream-skimming and the payment of uneconomic support to competitors.<sup>25</sup> Any Incumbent LEC that has failed to disaggregate support effectively may modify its disaggregation filings subject to state approval.<sup>26</sup>

SRTI's proposed redefinitions are designed to reflect the boundaries of the Reservation and the currently Commission licensed service area, they do not target any low cost areas, and they meet the Joint Board's goal of minimizing cream-skimming.

b. Recognition of the rural telephone companies' unique status.

Second, the Joint Board recommended that the Commission consider the rural carrier's special status under the 1996 Act.<sup>27</sup> Congress mandated this public interest analysis in order to protect the special status of rural carriers in the same way it established special considerations for

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<sup>22</sup> *Virginia Cellular*, 19 FCC Rcd at 1579.

<sup>23</sup> See Application at Exhibit VIII -- Service Area (Pop by Communities) (Pop by Political Districts)

<sup>24</sup> See *Federal-State Joint Board on Universal Service and Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, CC Docket No. 96-45, Fourteenth Report and Order, Twenty Second Order on Reconsideration, and Further Notice to Rulemaking, CC Docket No. 00-256, Report and Order (FCC 01-157, released May 23, 2001).

<sup>25</sup> See *Federal-State Joint Board on Universal Service, Western Wireless Petition for Designation as an Eligible Telecommunications Carrier for the Pine Ridge Reservation in South Dakota, Memorandum Opinion and Order*, 16 FCC Rcd 18133, 18141(2001).

<sup>26</sup> See 47 C.F.R. §§ 54.315(b)(4); 54.315(c)(5), 54.315(d)(5).

<sup>27</sup> See *Joint Board Recommended Decision*, 12 FCC Rcd at 180.

rural carriers with regard to interconnection, unbundling, and resale requirements.<sup>28</sup> No action in this proceeding will affect or prejudice any future action that either the Commission, the North Dakota PSC, or the South Dakota PUC may take with respect to any ILEC's status as a rural telephone company, and nothing about service area redefinition will diminish a rural ILEC's status as such. Additionally, the redefinition will have no impact on the current ILECs, universal service support, as the funding will continue to be available to the ILECs for all of the eligible lines they serve.

c. Recognition of any added administrative burdens.

Finally, the Joint Board recommended that the Commission consider any administrative burden a rural ILEC would face. In this case, SRTI's request to redefine the affected Incumbent ILECs service area along wire center boundaries is made solely for ETC designation purposes. Defining the service areas in this manner will in no way impact the way in which the Incumbent ILECs will calculate their costs, or receive universal service support; it is solely to enable SRTI to begin receiving high-cost support in those areas in the same manner as the Incumbent ILECs do. The Incumbent ILECs may continue to calculate costs and submit data for purposes of collecting high-cost support in the same manner as they do now.

Should the Incumbent ILECs choose to disaggregate support out of concerns about cream-skimming by SRTI (though no such concern should exist as to SRTI), this disaggregation of support will not represent an undue administrative burden. To the limited extent that this process may be burdensome to any ILECs, the benefits of preventing cream-skimming and promoting competitive neutrality will outweigh any administrative burden involved.

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<sup>28</sup> See *id.*

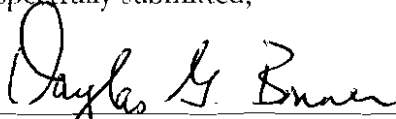
#### IV. CONCLUSION

In the end, it is consistent not only with the Commission's own policies, but also with the federal Constitutional relationship and the Treaty agreements with the SRST, and the established principles of federal Indian law and the federal trust responsibility, to empower the Tribe to provide services on its own lands. SRTI seeks only to compete on an equal footing in order to provide wireless services within its own nation.

SRTI respectfully requests that the Commission redefine the wire centers currently in the service areas of the Cheyenne River Sioux Tribe Telephone Authority, West River Cooperative Telephone Company, West River Telecommunications Cooperative, and Qwest Corporation which are shared with SRTI's service area.

Dated this 18<sup>th</sup> day of February, 2010.

Respectfully submitted,

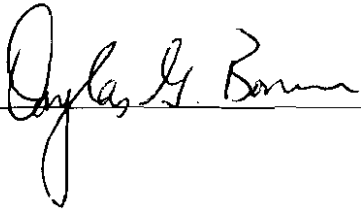


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*Attorneys for Standing Rock Telecommunications, Inc.*

### Certificate of Service

I hereby certify that on February 18, 2010 a copy of the foregoing Petition of Standing Rock Telecommunications, Inc. to Redefine Rural Service Areas was served on the following parties by First-Class Mail, postage prepaid:



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Charles W. Murphy, Chairman  
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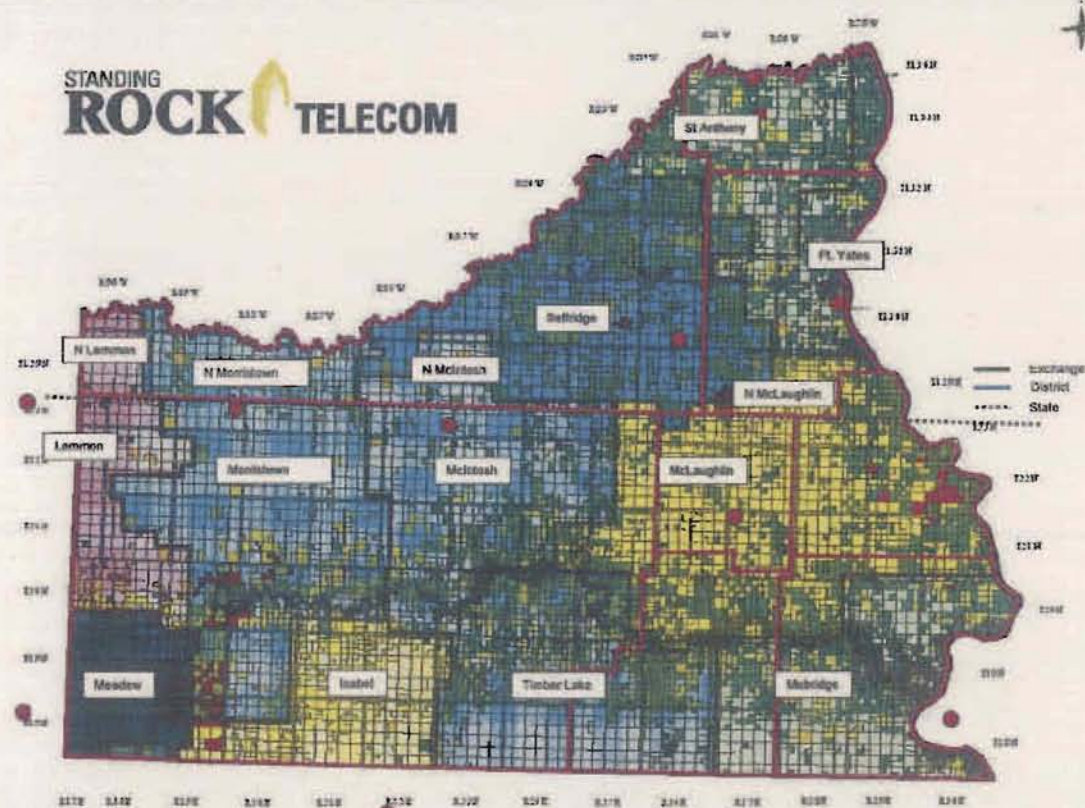


# **EXHIBIT I:**

## **SERVICE AREA**

# RJRAL LEC's STUDY AREAS WITHIN STANDING ROCK TELECOMMUNICATIONS SERVICE AREA




MTA	12														
State	North Dakota							South Dakota							
County	Sioux County							Corson County							
LATA	638							640							
SAC	381637			395145			391689	381637	391671	395145			391689	395145	
ILEC	WRT			QWEST			WRCTC	WRT			QWEST			WRCTC	CRSITA
NPA/NXX	701/854	701/445	701/422	701/276	701/522	701/376	605/823	701/827	605/845	605/273	605/524	605/865	605/374	605/788	605/466
Rate Center	Fort Yates	St. Anthony	Se/ridge	N McIntosh	N Morristown	N Lemmon	McLaughlin	N McLaughlin	Mobridge	McIntosh	Morristown	Timberlake	Lemmon	Meadow	Isabel
CLI	FTYTNDXARS8	STATNDXBRS4	SLRGNDXARS4	MCINSDCODS0	NRTWSDCIRS2	LMMNSDXARS1	MCLGSDXARS0	MCLGSDXARS0	MBRGSDXADS1	MCINSDCODS0	MRTWSDCORS2	TMLKSDCORS2	LMMNSDXARS1	MEDWSDXARL0	ISBLSDXA466
Rate Center Coverage	Complete	Partial	Complete	Complete	Complete	Partial	Complete	Complete	Partial	Complete	Complete	Partial	Partial	Partial	Partial



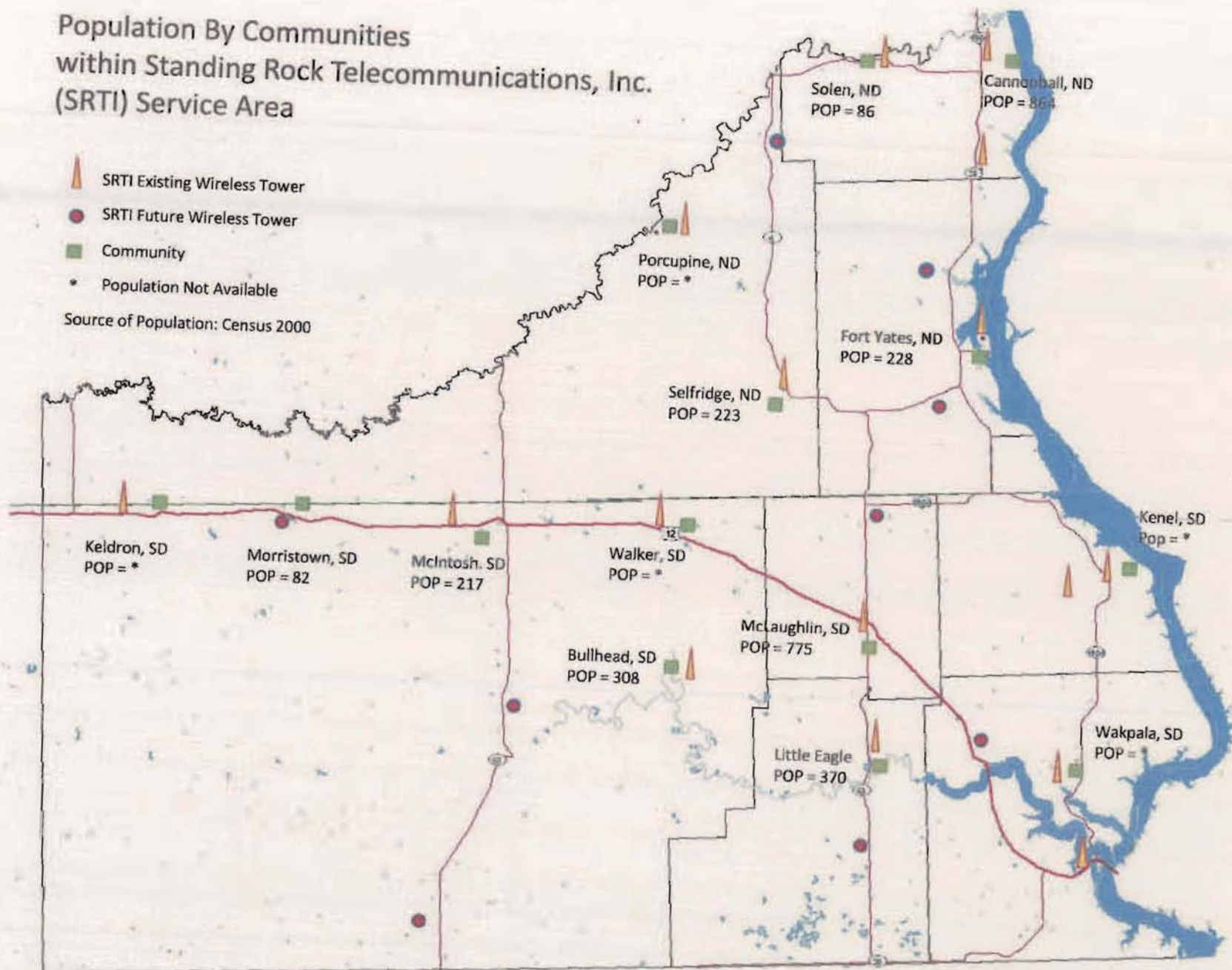
Prepared by TICOM, Inc.

12/1/2000

# Population By Communities within Standing Rock Telecommunications, Inc. (SRTI) Service Area



-  SRTI Existing Wireless Tower
-  SRTI Future Wireless Tower
-  Community
- \* Population Not Available

Source of Population: Census 2000





# Population By Standing Rock Sioux Tribe (SRST) Political District within Standing Rock Telecommunications, Inc. (SRTI) Service Area

-  SRTI Existing Wireless Tower
-  SRTI Future Wireless Tower
- POP = Population
- OHU = Occupied Housing Unit
- Source of Population: Census 2000

